

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

CommScope, Inc.,	)	Civil Action No. 19-cv-15962-
	)	MCA-LDW
Plaintiff,	)	
	)	
v.	)	
	)	
Rosenberger Technology (Kunshan)	)	<b>DECLARATION OF ROY LIU</b>
Co. Ltd., Rosenberger Asia Pacific	)	<b>IN SUPPORT OF</b>
Electronic Co., Ltd., Rosenberger	)	<b>MOTION TO SEAL</b>
Technology LLC, Rosenberger USA	)	
Corp., Rosenberger North America	)	
Pennsauken, Inc., Rosenberger Site	)	
Solutions, LLC, Rosenberger	)	
Hochfrequenztechnik GmbH & Co.	)	
KG, Northwest Instrument, Inc.,	)	
CellMax Technologies AB, Janet	)	
Javier, and Robert Cameron,	)	
	)	
Defendants.	)	
	)	

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I, ROY LIU, hereby declare as follows:

1. I am counsel for Rosenberger Technology (Kunshan) Co. Ltd. ("Rosenberger Kunshan"), Rosenberger Asia Pacific Electronic Co., Ltd. ("Rosenberger Asia Pacific"), and Rosenberger Technology LLC ("Rosenberger Technology") (collectively, "Rosenberger") in the above-captioned matter.

2. I make this Declaration in support of the Motion to Seal in accordance with Local Civil Rules 5.3(c)(3) and 7.2 (the "Motion") in connection with Rosenberger's February 12, 2020 Letter to the Honorable Leda Dunn Wettre in

response to CommScope, Inc.'s February 11, 2020 Letter to the Honorable Leda Dunn Wettre (the "Letter"), and certain exhibits thereto (ECF No. 201).

3. The materials identified in the Consolidated Index submitted herewith should be maintained under seal on the Court's docket because they contain confidential, proprietary, and non-public information regarding Rosenberger's (the "Movant") business operations. Based upon my own knowledge, public disclosure of this information could cause clearly defined, serious, and unnecessary harm to the Movant. Specifically, the redacted portions of the Letter and exhibits, and the exhibits to be kept sealed in their entirety, are narrowly tailored to statements that disclose information contained in discovery materials that have been designated Confidential or Attorneys' Eyes Only by the propounding party. These statements concern confidential information about the Movant's business operations, including confidential and commercially sensitive information about the Movant's base station antenna design and development processes. The documents also contain personal information concerning Rosenberger's employees.

4. Plaintiff has contested the sealing of certain Identified Materials as indicated in the Consolidated Index.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 26, 2020.

Roy Liu  
Roy Liu